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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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IN RE:

CHAPTER 13

CHRISTOPHER ORMSBY AND
KAREN ORMSBY,

CASE NO. 19-22997 (SHL)

DEBTOR(S).

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CERTIFICATION IN SUPPORT OF MOTION FOR ORDER APPROVING POST-PETITION AUTO PURCHASE BETWEEN THE DEBTOR AND LASORSA CHEVROLET

Todd S. Cushner, Esq. an attorney at law duly admitted to the Southern District of New York, affirms as follows:

1. I am the attorney for debtors, Christopher Ormsby and Karen Ormsby, (the “Debtors”) in the instant bankruptcy proceeding.
2. I submit this affirmation in support of Debtor’s application seeking an Order approving a post-petition auto purchase between the Debtors and LaSorsa Chevrolet (“LaSorsa”).
3. On May 16, 2019 (the “Petition Date”), the Debtors filed a voluntary petition for relief under chapter 13 of the Bankruptcy Code in the United States Bankruptcy Court for the Southern District of New York, White Plains Division.
4. On June 5, 2020, the Debtors chapter 13 plan was confirmed.
5. Prior to the Petition Date, on or about May 30, 2014, the Debtors entered into a retail installment contract with Curry Hyundai Subaru to purchase one (1) 2014 Subaru Legacy

Outback. (Annexed hereto as **Exhibit “A”** is a copy of Wells Fargo Bank, N.A., d/b/a Wells Fargo’s Auto proof of claim, Claim No. 14, with the lease agreement).

6. The Debtor’s lease agreement with Wells Fargo expired on September 29, 2020.

7. The Debtor seeks Court approval to enter into a thirty-six (60) month agreement with LaSorsa for a 2017 Chevy Trax with monthly payments in the amount of \$369.78 per month. (Annexed hereto as **Exhibit “B”** is a copy of the proposed purchase agreement between the Debtor and LaSorsa).

8. The new lease agreement will decrease the Debtor’s monthly car payment from \$382.08 to \$369.78 per month.

9. Upon approval of this motion, schedules A/B, D and G of the Debtor’s petition will be amended to reflect the new lease agreement.

10. The approval of this lease agreement will not adversely impact the Debtor’s creditors as the Debtor’s chapter 13 plan payments remain the same.

11. Additionally, the Chapter 13 Trustee, Krista M. Preuss does not object to the post-petition auto purchase application by the Debtors and LaSorsa. (Annexed hereto **Exhibit “C”**)

WHEREFORE, the Debtor respectfully requests that this Court grant the Debtor’s Motion and enter an Order Approving the Debtor’s Purchase Agreement with LaSorsa; and for such other and further relief as this Court may deem just and proper.

Dated: White Plains, New York
June 7, 2021

Respectfully submitted,

By: /s/Todd S. Cushner
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